

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT
OF ALABAMA

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

RICHARD WAYNE WRIGHT, SR. *
Plaintiff, * Civil
- VS - * CASE NO:
SELVESTER NETTLES, et. al. *
Defendants * 2:05CV439-A

MOTION FOR APPOINTMENT
OF COUNSEL

COMES NOW, Plaintiff Richard Wayne Wright, Sr., Pro-se. Before this honorable Court on a motion For appointment of Counsel. The plaintiff will respectfully show this honorable Court the following:

1). Due to the use of psychotropic drugs administered into my body by defendants it has affected plaintiff ability to

maintain a normal thought pattern. This makes it difficult to obtain the knowledge of the law to litigate this case. As a result of such plaintiff have to rely upon the assistance of fellow inmates. Lewis - vs - Casey — St. Ct. —
Johnson - vs - Avery — St. Ct. —.

2). This case involves medical issues that may require expert testimony

3). This case will require discovery of documents and depositions and interrogatories of a number of witnesses.

4). Plaintiff has only a high school education and has a limited knowledge of the law.

5). Plaintiff is unable to afford counsel

6). The issues involved in this case are complex.

7). Plaintiff is a segregation inmate, has extremely limited access to the law library.

Wherefore, the plaintiff's prays this motion For the appointment of Counsel be granted.

Done this the 30 day
of April, 2005.

Respectfully Submitted,
Richard W. Wright, Sr.

Petitioner, Pro-se.

Richard Wayne Wright, Sr. #187140
Ventress Correctional Facility
Dorm 9-B Segregation
P.O. Box 767
Clayton, Ala. 36016

Plaintiff Address

Richard Wayne Wright, Sr. #187140
Ventress Correctional Facility
Dorm 9-B (Seg.)
P.O. Box 767
Clayton, Ala. 36016

Certificate of Service

This is to certify that I Richard Wayne Wright, Sr. am the petitioner in the above /attach Complaint encaptioned matter and I have this 30 day of April, 2005, sent such motion to the clerk of the Court. By way of hand mail by the officer on duty to be delivered to the mail room or U.S. mail box at Ventress Correctional Facility to be properly mailed by way of U.S. Mail with pre-paid ~~per~~ ^{R.W.W.} postage.

Done this the 30 day of April, 2005.

Respectfully Submitted,
Richard W. Wright Sr.
Petitioner, Pro. se.